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Date: August 25, 2020 at 8:47:25 AM MDT

To: keigwin.richard@epa.gov, William Chism <chism.bill@epa.gov>, Daniel Kenny <Kenny.Dan@epa.gov>

Subject: Dicamba

I have attached three photos of soybean fields I have inspected in 2020 - two from Arkansas and one from South Dakota. I have also attached a photo of a sycamore tree and one of a ginkgo tree.

I have travelled extensively throughout Arkansas, Missouri, West TN, Iowa and South Dakota this summer and the soybean photos are very representative of what happened to any farmer who had the audacity to try to grow any soybeans other than Xtend. Why are these farmers not receiving equal consideration - compared to those who want the Xtend technology - in the registration process? For a farmer to not have the right to grow anything he chooses without the fear of chemical trespass - is simply wrong. Some say things are getting better as complaint numbers are down. In Arkansas we have over 200 alleged dicamba complaints, down from nearly 1000 in 2017. Does that make 200 good? Two hundred complaints on a single herbicide would have been unheard of prior to Xtend crops. Also most all of our dicamba applications occurred after the May 25 cutoff so farmers are simply giving the middle finger to regulations. I observed the same in SD. In SD the state will not send an inspector out unless the complainant names the perpetrator. They won't go look but claim they have less complaints than last year. Go figure. The MO Department of AG won't respond to a dicamba complaint so sure their numbers are down. In addition many growers have surrendered to the company marketing model, defensive planting, and that has helped soybean complaint numbers. Does this make it right. Many folks just don't complain because nothing ever comes of it.

You will note in the photos I sent there are no drift patterns. The field in the first photo is one of 1400 acres that were perfectly uniform in damage. That is simply caused by atmospheric loading of dicamba volatiles. There was not a direct potential dicamba source within line of sight of any field. I found the same thing in SD. Also up I-29 from the bottom to top of Iowa you can pick out every Xtend and non-Xtend field at Interstate speed limits.

The sycamore tree photo wasn't near a dicamba application. I have observed them all over the Mississippi River Delta and all the way to Kankakee IL. If they are anywhere, including the middle of towns in the in-crop use areas, that is what they look like. That is only one example. Many other species including oaks, cypress, ornamentals and fruit trees are being damaged. The ginkgo tree was on a University Experiment Station. Anyone who is involved in the registration decision should be required to take a driving tour of the MO bootheel and just look at the trees- in towns and throughout the countryside. They look terrible as most have been hit multiple times over several years.

I was a causation expert in the Bader Farms peach trial. As a result I have seen many of the

company registration documents and the entire process was a joke. Now they propose to send some more Vapor Grip (vinegar) with the Xtendimax for the applicator to dump in the tank and call it a fix. How much more verified in field use data and information do they have to support this being a fix? Furthermore we know the addition of glyphosate to the tank with dicamba dramatically increases volatility yet they continue to promote it. Now they want to register glufosinate-ammonium with dicamba for use in XtendFlex. That alone tells me they aren't serious about reducing or eliminating volatility. Nothing they have told the Agency about off target movement has been right yet. Science simply does not support any of the current dicamba formulations being registered for in-crop use. Until a completely non-volatile formulation of dicamba is developed, this herbicide simply will not stay on target.

I realize the entire dicamba situation is complex. Like you, I have been embroiled in the middle of it for several years. It is the most divisive herbicide technology ever in my 46 years as a weed scientist. There three categories of soybean farmers: those who want the technology; those who have been forced to plant it defensively for economic survival; and those who want to plant other technologies for very sound reasons. There are also homeowners and growers of other crops being negatively affected. It appears that only those that wish to use the Xtend technology have been considered. In reality, they have options to use other technologies. Those being negatively impacted by dicamba are innocent bystanders. I encourage the agency to give equal consideration to all parties involved in the upcoming registration decision.

Sincerely,
Ford Baldwin Ph.D